

**BROMBERG LAW OFFICE, P.C.**

Brian L. Bromberg (Admitted in NY, NJ & CA)

26 Broadway, 27th Floor  
New York, NY 10004  
Phone: (212) 248-7906  
Fax: (212) 248-7908

July 24, 2019

Via ECF

Katherine Polk Failla, U.S.D.J.  
Southern District of New York  
40 Foley Square  
New York NY 10007

Re: *Patricia Cordell v. Western Credit & Collection Service, Inc.*  
Case No. 18-CV-11879-KPF

Dear Judge Failla:

My office represents the plaintiff, Patricia Cordell, in the above-referenced case against Western Credit & Collection Service, Inc., Kevin Harker, K V Harker, Inc. d/b/a Community Association Law Group, and Michael Klaar. The lawsuit involves claims of violations of the Fair Debt Collection Practices Act, New York General Business Law § 349, and abuse of process.

I am writing to request a 60-day extension of all discovery deadlines. I am making this request for four reasons. First, I am still recovering from the problems resulting from moving my office on an emergency basis last month. I had to get a number of extensions on other cases to deal with the problems I had in locating space and then moving – these extensions cut into the time I had planned to devote to this case. Second, difficulties I had amending the complaint also slowed down the case. Third, the air-conditioning in my new office has not been working. The recent heatwave has made it difficult to work and the portable air-conditioning units we have brought in keep overloading the circuit breakers, knocking out everyone's computers. I do not know when this problem will be resolved. (If the problem is not resolved by the end of the summer, I am planning on moving again next year.) Finally, I am going to have to travel to Oregon to take multiple depositions on this case and I will need some additional time to travel cross-country to take those depositions.

Defense counsel has agreed to the above request.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: Arthur J. Sanders, Esq. (Via ECF)